

September 30, 2021

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Hon. Andrew L. Carter Jr.
United States District Judge
U.S. District Court for the Southern District of New York
United States Courthouse
40 Foley Square, Room 1306
New York, New York 10007

USDC SDNY
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Re: Edwards v. Commissioner of Social Security
Civil Action No: 1:20-cv-08843-ALC

MEMO ENDORSED

Dear Judge Carter:

This letter respectfully requests an extension of time of sixty (60) days for Plaintiff to serve her Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on October 4, 2021. However, due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare her Motion. Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on **December 3, 2021**. Subsequently, in accordance with the pattern of the Standing Order, the Commissioner's response to the Motion for Judgment on the Pleadings would then be due **February 1, 2022**. Plaintiff's Reply would then be due **February 22, 2022**.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.

Bar Code H06529

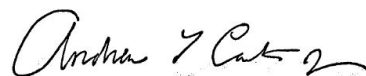
Counsel for Plaintiff

CC [via ECF]: Joseph Anthony Pantoja, Esq. (Counsel for Defendant)

SO ORDERED.

Dated: 10/1/2021

New York, NY



Honorable Andrew L. Carter Jr.
U.S. District Judge